

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking on the
Commission's Own Motion to Adopt New
Safety and Reliability Regulations for Natural
Gas Transmission and Distribution Pipelines
and Related Ratemaking Mechanisms.

Rulemaking 11-02-019

(February 24, 2010)

**Opening Comments of Joint Parties, Black Economic Council, Latino Business
Chamber of Greater LA and the National Asian American Coalition (comments due
April 13th, 2011)**

Faith Bautista, President
National Asian American Coalition

Jorge Corralejo, Chairman and President
Latino Business Chamber of Greater Los
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April 8, 2011

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The OIR issued more than five months after the September 9th San Bruno natural gas disaster sets forth the broad scope of this proceeding in its Overview. It describes the human suffering as overwhelming and the Commission's "resolve to take all actions necessary to ensure that it never happens again." The scope of this proceeding is also very broad as demonstrated by its opening remark that this Rulemaking "is a forward-looking effort to establish a new model of safety applicable to all California pipelines."

This is confirmed by Assigned Commissioner Florio's recent March 24th statement in his "Notice of Availability." As Commissioner Florio pointed out, this proceeding "to move this Rulemaking forward, the Commission requires a robust record and must have this record as soon as possible (emphasis added). As we pointed out in the rulemaking, this proceeding is not business as usual, these are extraordinary circumstances, and we need extraordinary efforts to achieve our goal. (emphasis added).

The Joint Parties are in full agreement with Assigned Commissioner Florio's statements in developing a robust and timely record as soon as possible. But even more importantly, we believe that these are extraordinary circumstances and we need extraordinary efforts to

achieve these goals, which should ensure public safety, human life and that “it never happens again.”

Unfortunately, the direction of this OIR appears to be moving toward specifics contrary to the overview statement that “specific investigations of PG&E’s conduct and any penalties will take place on a different docket.” (See for example, April 11th hearing in which we are not participating in due to lack of specific expertise).

As the Commission’s Overview sets forth, the Commission seeks to obtain strong public input before making any decisions.

In the context of ensuring that it never happens again and in the context of ensuring strong public input and future community preparedness, our opening comments will address key issues relating thereto.

Section I

Diminishing Community Anxiety: Community Education and Preparedness Program and Locally Trained Gas Transmission Experts (Emergency Corps)

“Our family has suffered as much as any Japanese family affected by the Japanese nuclear disaster. Comparable attention must be paid to our concerns.” –San Bruno homeowner whose home was destroyed and suffered substantial injuries. ¹

Shortly after this OIR was issued on February 24th, the Black Economic Council, the Latino Business Chamber of Greater LA and the National Asian American Coalition (hereinafter referred to as the Joint Parties) contacted the PUC Public Advisor and other PUC staff, as well as PG&E’s senior staff, to discuss immediately conducting a ratepayer survey within the PG&E area as to ratepayer concerns and future actions that they wished. For reasons unknown to the joint parties, neither PG&E nor the CPUC wished to conduct any surveys

¹ The injured San Bruno homeowner providing this quote has temporarily requested that their name be withheld until their lawyer can determine whether it will adversely affect their lawsuit against PG&E.

and apparently, the CPUC wished to rely primarily upon its public hearings. As a result, the joint parties assisted by the National Hispanic Organization of Real Estate Associates (herein-after referred to as NHORA), conducted a survey of 190 ratepayers primarily in the San Mateo and Santa Clara county areas. As a result of a request from ALJ Bushey, this survey, which was promptly submitted to the Commission in advance of the Public Hearing on April 5th is now part of the record.

The Joint Party survey completed by the Joint Parties makes clear that an overwhelming percentage of PG&E ratepayers are more interested in fixing the problem first rather than focusing on punishing PG&E (85% said to fix the problem first so that it does not happen again).

Second, when asked who should pay the costs to ensure that there are no future gas explosions, 72% said it should be borne by either the shareholders or PG&E's top executives. Only six percent said that ratepayers should pay the costs. However, 22% said it should be paid for by a combination of shareholders, top executives and ratepayers.

The survey also asked whether the PUC and/or Gov. Brown should require PG&E to train local skilled residents to turn off the gas lines to avert future explosions. An overwhelming 90% said yes.

Thirdly, one of the key survey results, which apparently is not being considered in this proceeding but which we respectfully urge to be considered in this proceeding, is whether there should be any gas rate increases for PG&E customers until this Commission completes this OIR. Specifically, when the 190 ratepayers were asked whether PG&E should receive any gas rate increases, 88% said that there should be no rate increase until PG&E fixes all of its gas transmission problems.²

² Please see ruling of ALJ Wong in A. 09-09-013 of April 4, 2011 denying the National Asian American Coalition, the Black Economic Council and the Latino Business Chamber of Greater LA's joint motion for party status to intervene filed on March 18, 2011, or three days after his March 15th decision supporting a significant rate increase. The joint parties are considering appealing the April 4th ruling by the ALJ and will seek to incorporate therein the results from the 190 ratepayers surveyed, the overwhelming majority of whom (88%) oppose any rate increase until after PG&E fixes all of its gas problems.

As its first order of business, we would urge the Commission to issue an order to PG&E and perhaps to Sempra and SoCal Gas and other affected utilities requiring that they submit a plan to conduct comprehensive surveys of ratepayer concerns and desires for future preparedness. It should include developing the questions, sample size and interviews with the CPUC and community groups. See Attachment A relating to proposed orders by the Joint Parties in these opening comments.

No future surveys should be left to PG&E alone given the high cost to the ratepayers and the ineffectiveness of PG&E's gas transmission survey of 15,302 ratepayers. As PG&E has reported, only 20 ratepayers responded, despite the survey being only a brief questionnaire (Wall Street Journal, March 3rd, 2011).³ "San Bruno Hearings Raise Doubts on Pipeline Warning." Of the 20 who did respond, only three said they had received any gas pipeline information in the prior two years. (PG&E has agreed within the next ten days to provide the joint parties with additional information on the questionnaire and its costs).

A future survey is especially crucial since the initial public hearing despite the mailed notice produced fewer than 100 attendees outside the Joint Party participation (Forty four from Joint Parties) and only a relative handful of community speakers outside the nineteen working with the Joint Parties. As the attached April 6th letter to this Commission by the joint parties sets forth (as incorporated by reference herein), the public notice was not cost effective and may have cost up to four thousand dollars (\$4,000) per person who attended and more than twenty five thousand dollars (\$25,000) per ratepayer who spoke. The exact costs will be provided by PG&E within ten days.³

It should be noted that the primary ground of the denial of party status is because the ALJ contends that the Commission has already heard from low income customers. However, this survey is the first scientific survey of ratepayer opinion and is essentially different from opposition based upon any particular nonprofit's particular perspective. The joint parties have as a result requested on April 7th, a meeting with Assigned Commissioner Simon in their present capacity as a non-party to the ongoing natural gas rate increase proceeding (A. 09-09-013) to discuss the undisputed fact that 88% of PG&E's customers oppose a rate increase until it fixes all of its gas problems.

³ Of the estimated less than 140 persons at the April 5th hearing, 44 were brought by the joint parties and NHORA. Not included in this estimate were the approximately one dozen police and sheriffs attending and the large number of PUC staff, which including Commissioners exceeded twenty.

Community Outreach, Education and Preparedness Program

“The loss of lives and homes is only a small part of the damage that occurred. The Japanese nuclear disaster has compounded our concerns that neither PG&E or the PUC has any effective plans to ensure that this will never happen again. ” –Neria Canonizado, who attended the April 5th hearing.

A number of technical matters are being discussed by the PUC with PG&E, as set forth in this OIR, Attachment A. However, the community does not necessarily have confidence in technical discussions, particularly in the context of the increasing number of revelations relating to lack of PUC oversight and PG&E negligence. See for example, TURN handout at April 5th Public Hearing including TURN comments such as “this could happen in my neighborhood” and dangerous practices that put all of our neighborhoods at risk.”⁴

As National Hispanic Organization of Real Estate Associates has pointed out, the number of homes and homeowners directly affected by the explosion pales in comparison to the far larger number of residents whose home values have been affected by the uncertainty caused by the explosion and the delays in addressing public concerns. We believe that if comprehensive medical records were secured as to San Bruno residents from medical plans such as Kaiser Permanente, a huge surge in health problems has occurred since the September 9th hearing. (PG&E might be requested to secure such data by the CPUC and have

⁴ See for example recent articles such as “Safety Valve was Skipped, Wall Street Journal, March 2, 2011; “Exec. Calls Blast Anomaly,” San Francisco Chronicle, 3-4-11; “Regulators Unsure Blast Was Freak Accident,” Wall Street Journal, 3-4-11; “Avoiding the Next San Bruno,” San Francisco Chronicle 3-4-11; “PG&E’s Woes Hits Execs Pay Packages, 4-1-11; “PG&E May Ask to Pass Cost Along: Utilities Estimate of Expense Soars,” San Francisco Chronicle 2-25-11; “PG&E Faces High Cost of Pipelines,” New York Times, 3-4-11; “Screwed Up, Milpitas Repair Boosted Pressure”, 3-8-11, PG&E Said It Would Test Large Pieces of Pipeline, 3-16-11;

See also “PG&E Cut Back Pipe Replacement Program in 2000,” 3-28-11; “Feds Say PG&E Pipe Safety Rule was Incorrect. San Francisco Chronicle 3-13-11; “PG&E Requests More Time for Checking Pipes,”San Francisco Chronicle, 3-23-11; “2nd Apparently Flawed Weld Seen Near Inferno Site,” 3-20-11; “Disabled Valves Went Unnoticed,” San Francisco Chronicle 3-18-11; “Watch Dog Slams PG&E for Surges,” San Francisco Chronicle 3-23-11; “It Has Been Six Months-Scars Slow to Heal,”San Francisco Chronicle, 3-9-11; “Utility Missing Pipe-Safety Records,” Wall Street Journal, 3-20-11, „Feds Find Egregious Flaws in Gas Pipeline Welding,” San Francisco Chronicle, 3-4-11; “Feds Take Leading Role in Making PG&E Safer,”San Francisco Chronicle, 3-2-11 and “Resident Demand Safety,” San Francisco Chronicle, 4-6-11.

it available before the scheduled May Public Hearing in Santa Rosa).

We therefore urge that within thirty days, PG&E and possibly other affected utilities, meet with the PUC and community groups to develop an extensive on-the-ground Community Education and Preparedness Program.

Given the lack of success by PG&E in its past community awareness programs and staff limitations at the CPUC, the Joint Parties urge that local nonprofit groups play a major role, in coordination with PG&E and the CPUC, in developing the program.

The joint parties are putting in place a possible massive but relatively inexpensive Community Education and Preparedness program outline. It is designed as the ratepayers wish to be paid for by PG&E shareholders and possibly federal government emergency disaster funds. We will also be contacting foundations that are increasingly concerned about the potential of gas explosions, nuclear disasters, public uncertainty that could lead to panics and possibly unnecessary calls for government control of utilities. (The Joint Parties oppose government control of public utilities but do strongly support greater regulatory scrutiny and where appropriate, severe punishment); ⁵ (see proposed Order section).

Locally Trained Emergency Corps To Manually Turn Off Gas Transmission Lines Within Five Minutes

Given the nature of PG&E's centralized operations and the inadvisability, at least from the perspective of the Joint Parties, to decentralizing PG&E, we urge the creation of a locally-trained Emergency Gas Transmission Corps. They would be local residents, perhaps among the unemployed and underemployed, who would be available within five minutes of any disaster to have the disaster under control, and in most cases, to avert any disaster. In contrast, the centralized PG&E operation was unable to address the explosion until 90

⁵ Among the joint parties, there are somewhat different views as to the merits of local communities owning utilities, although the joint parties did oppose PG&E shareholder Proposition 16, which cost PG&E shareholders \$46 million. Our lack of support for local communities owning utilities is attributable in part to our view that government bureaucracies may be as costly and no more efficient while being less subject to public scrutiny and criticism.

minutes thereafter and appears to have failed to comprehend information relating to an imminent disaster that was pecculating in the community and among PG&E lower level officials at a date prior to September 9.

As the survey of 190 ratepayers demonstrates, 90% of those surveyed support such a local emergency corps. Such a corps is also consistent with Gov. Brown's actions during his first term in office when he established a conservation corps from unemployed youth.

This plan should be developed jointly by the PUC, PG&E, other affected utilities and community groups, including local government agencies. We will be meeting with Assemblyman Hill of San Mateo County and the Mayor of San Bruno to begin to discuss pilot programs and will invite the PUC and PG&E to join us once dates are set.

In virtually every community affected or likely to be affected by the Commission's OIR, 10% or more of the population is unemployed and an additional 15% are underemployed or temporarily out of the labor force. Many are skilled in related fields and could readily be recruited for prestigious locally led emergency gas transmission corps or emergency disaster corps. (30% of California's Blacks and Latinos are unemployed, underemployed or temporarily out of the work force).

As to who should bear the cost of this local emergency corps, we propose that this Commission consider the preferences of the 190 person ratepayer survey that the cost be borne by PG&E shareholders and executives (72%). However, along with the PUC and PG&E, we would be pleased to explore federal funding relating to unemployment funds and job training, particularly through the US Department of Labor.

Upfront Funding for Nonprofit Intervenors Without a Steady Stream of Intervenor Funds

The PUC has a relatively effective intervenor compensation system which provides for compensation a year or more after the intervenors engage in their work. For emergency issues, such as this OIR, the system does not work except, perhaps for those intervenors that

are already an integral part of the intervenor compensation system and receive regular large and steady intervenor compensation funding.

As to the Joint Parties, we have no funds to hire any experts and no funds to even pay for the surveys we engaged in. We therefore urge the CPUC to consider that PG&E and the other major utilities set up a \$500,000 to \$1 million dollar Up Front Intervenor Compensation system for experts. (Attorney compensation would not be allowable). These funds would be recoverable from the ratepayers. Alternatively, the CPUC could, on its own, contact major foundations in the Bay Area to provide some or all of this funding. See attached Order.

OIR Attachment A And Joint Parties Lack of Expertise

In the absence of the expertise that no nonprofit parties except TURN may have, we are not in a position to comment at this time on Attachment A relating to, for example, “strengths test requirements” until we are able to afford to hire an expert and/or the CPUC specifically requests that we provide expertise, We are therefore at this time avoiding comments so as to bit delay as necessarily to the CPUC and parties with substantial expertise.. For example, we are unable to determine as to whether GO 112-E of Attachment A, PG&E should be allowed to seek temporary exemptions from the requirement set forth in subsection 145.1 and .2. (See subsection 145.3). Similarly, we are unable to comment on Section 125 relating to installation reports, including technical matters relating to the definition of “construction of a new pipeline.” (Section 125.3).

The unavoidable interrelationship of often archaic technical matters in a General Rule making intended to secure strong and active public input may be counterproductive to active public participation. For example, in the expensive but relatively ineffective mailer by PG&E alerting ratepayers to the April 5th Public Hearing, the primary focus appear to be on persons testifying if they were familiar with technical matters relating to “new models of natural gas pipeline safety regulations.” This may have inadvertently but very substantially reduced the number of public participants at the hearing which many thought would bring out an overflow crowd of over 500.

Respectfully submitted,

/s/ Len Canty

Len Canty, Chairman
Black Economic Council

/s/ Jorge Corralejo

Jorge Corralejo, Chairman
Latino Business Chamber of Greater Los Angeles

/s/ Faith Bautista

Faith Bautista, President and CEO,
National Asian American Coalition

/s/Robert Gnaizda

Robert Gnaizda, Of Counsel (with assistance from Aaron Lewis)

Attachment A:

Proposed Orders As to Community Education, Local Emergency Corps and Up Front Funding

- 1) Given this Commission's desire to ensure that the San Bruno explosion "never happens again" and our desire to allay ratepayer and public uncertainty, particularly in the context of other gas explosions and other disasters, we urge PG&E and the Public Advisors office of the CPUC to meet with interested community parties to this proceeding within 15 days of this Order to discuss short, mid and long term community education and preparedness programs that have the strong support of local communities. We also urge the parties within 15 days thereafter to submit to us a provisional plan that can be implemented by no later than July 1st, 2011. The provisional plan should also include who will bear the costs.

- 2) Given the lack of preparedness and ability to instantly respond to crises by PG&E's professional staff, this Commission wishes to explore the development of local and/or regional emergency disaster and/or regional Emergency Gas Transmission Corps that will be hired from the community and trained by the utilities in coordination with local and/or regional authorities to instantly respond to future emergencies. We therefore request that both PG&E and the Public Advisors office meet with the joint parties and others who have expressed interest in this issue and coordinate with local and regional officials. This should be done within thirty days and a proposed plan should be submitted to this Commission by no later than July 1st, 2011. We also urge the parties to provide a blueprint of who should bear such costs and the amount of the estimated costs.

- 3) This Commission's intervenor compensation mechanism works well under most circumstances. It was not designed, however, for emergencies where expert input from the community is necessary. The Commission therefore urges PG&E and the other utilities to within thirty days come up with a plan to provide up to one million dollars in Up Front Funding for parties participating in this proceeding who do not have a stream of funding from prior intervenor cases to cover their ongoing costs. It

should be noted that no funds will be allowed for attorneys but only for experts, broadly defined, since this is an emergency.

April 6, 2011

Commissioner Mike Florio
President Michael Peevey
Commissioner Mark Ferron
Commissioner Catherine Sandoval
Commissioner Timothy Simon
Administrative Law Judge Maribeth Bushey
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Perspective of the Community on April 5th Public Hearing and Some Suggestions

Dear Commissioner Florio, President Peevey, Commissioners Ferron, Sandoval and Simon, and ALJ Bushey,

Many of the community who attended the April 5th hearing, including the three groups that are parties in this case, the National Asian American Coalition, the Black Economic Council and the Latino Business Chamber of Greater LA, were very appreciative that four commissioners presided at the first public hearing on April 5th. From a party perspective, we are also very pleased to see that California's first Latina commissioner was in attendance and is hopefully on her way to a full recovery. We need all commissioners to work together to ensure that this never happens again.

Based upon our estimates, there were less than 140 persons in attendance (not including police, sheriffs and CPUC staff) at what many believed would be an overflow crowd of 400 or more. Of the 140 or less persons in attendance, 45 were brought by the National Asian American Coalition, the Black Economic Council, the Latino Business Chamber of Greater LA and two groups we work very closely with, National Hispanic Organization of Real Estate Associates and Filipino American Real Estate Professional Association. Of the speakers, 19 were from our groups.⁶

In addition, we have so far received calls from 10 additional people who went to the hearing at our request, but could not find parking and were unaware of the shuttle bus service since notice of this service was not widely circulated. Thus, 54 persons contacted by us came to the

⁶ Attached as Exhibit A is the names of the 45 persons, including three from San Bruno. Also attached as Exhibit B is the list of families who have contacted us and whose homes were either burned to the ground or damaged.

hearings. This constitutes almost 40 percent of all the persons who attended the hearing who are not sheriffs, police officers, with the media or a part of the CPUC.⁷

Suggestions for Future Hearings

The notice that was sent to residents relating to the hearing apparently had very minimal impact upon attendance and could be perceived as not cost effective. Unfortunately, expensive mailings are often treated as junk mail. Further, the actual notice of the hearing appeared to encourage only participants who had technical knowledge of gas transmission proceedings rather than the typical PG&E ratepayer.

If requested, we will be pleased to work with the public advisor's office and Commissioner Florio to help design a more effective mailer or notice system. But, our primary suggestion is one that will be far more cost effective: That is, use community based groups to encourage participation through meetings and fliers.⁸

Survey of 190 Residents

As set forth in our letters of April 1st and 4th to you, we have provided you with surveys of 190 PG&E ratepayers, almost all of whom are from San Mateo and Santa Clara counties. Judge Bushey has requested and we will file by tomorrow, a formal motion so that the surveys can be part of the record. We will comply by April 7th.

The conclusions from the survey are especially important given the relatively small number of individuals who attended the hearing and an even smaller number of individuals (not including those associated with our organizations) that actually spoke.

On April 5th, we requested information from PG&E relating to their 2010 survey on gas transmission lines on 15,302 persons as reported in the Wall Street Journal of March 3, 2011. PG&E has informed us that they will fully cooperate with us and will have the information as to their survey made available to us within 10 days.

⁷ Attached as Exhibit C is the list of the ten residents of San Mateo and San Clara counties who came to the hearing but were not able to find parking and therefore did not make their presence known. If the CPUC wishes to write to them, we will provide their addresses.

⁸ Assuming that the mailer was sent to at least one million PG&E residents in the Bay Area, the cost of the mailer, including the preparation, etc., could have been at least \$400,000 and possibly more, all of which will eventually be paid by the ratepayer. Based upon our estimates of those who came as a result of the mailer, the cost may have been more than four thousand dollars (\$4,000) per person who attended. And it might have been as high as \$25,000 per ratepayer who testified. The total cost of the mailer and other efforts to notify ratepayers of the April 5th hearing will be secured from PG&E.

Once we discuss with PG&E their 2010 survey, we will discuss with them the value of an additional survey that will cover far more persons than appear likely to attend the hearings based the present inadequate notice system.⁹

If the survey prepared by the joined parties, the NAAC, the BEC and the LBCGLA, is also considered, then one plausible conclusion is that over three-fourths of those participating directly or indirectly in the first public hearing were brought by a combination of the National Asian American Coalition, the Latino Business Chamber of Greater LA and the Black Economic Council.

Suggestions for Future Hearing Format

Many in the audience were puzzled as to why so many important CPUC people were present but were not prepared to offer their views or to interact with the speakers. Related to this was puzzlement as to why it had taken seven months, as some speakers pointed out, before this first hearing was held on a matter of such importance. The Commission might therefore consider opening with some proactive statements. But, it was important that the Commission convey, as it successfully did, its desire to hear from the people, and it did so with great patience.

Many attendees at the hearing, including the numerous media, noted the absence of any senior PG&E officials. This was especially notable given that four of the five commissioners were present throughout the hearings, as well as the assigned ALJ. Our suggestion, which we believe would be helpful to PG&E in the long run, would be to have its CEO or its president be given the opportunity to address the group immediately after the commissioners make their opening remarks.

Two Concrete Actions that a Number of Speakers Urged Should Begin to be Implemented Quickly

⁹ In addition to the survey of 190, we attempted to conduct a survey at the hearing but in the absence of support from the CPUC, it was difficult to administer. Our preference would have been to be able to announce at the beginning of the proceeding that a volunteer survey was available for the people to fill out.

Of the 14 attendees at the hearing who responded, 79% said a rate increase should be denied until PG&E fixes the problem.

As to who should pay the cost as to solving the crisis, 7% felt it should be the ratepayers, 79% believed it should either be the shareholders or top PG&E executives and 15% felt it should be a combination of ratepayers, shareholders and executives.

Relating to whether the CPUC should require PG&E to train residents to prevent future disasters, including the creation of a local Emergency Gas Pipeline Corps, 79% supported the creation of an Emergency Gas Pipeline Corps.

As to whether the CPUC should punish PG&E or first fix the problem, there was overlapping responses, but it appeared that at least 74% believed that the problem should first be fixed before there was any punishment.

Based upon our survey of 190 PG&E families and in -depth discussions with scores of families from San Bruno and surrounding areas, including six that lost their homes, we offered to the Commission two very specific solutions (they were addressed in our letter of April 4th and were offered by many speakers at the hearing). The solutions are:

One, with PG&E's full cooperation, immediately begin to design a community education and preparedness program that could be led and designed by local communities.

Two, commence discussions that will lead to the training of a local Emergency Gas Pipeline Corps that will be able to address the problem on the ground within five minutes if a future problem arises.

We have notified PG&E of both of these matters and will, by the end of the week, seek a meeting with PG&E, to discuss both matters. It is our preference that senior CPUC staff join us for the meetings on both matters, including how to address the cost issue. Should senior staff agree to join us, we will also request a representative from Assemblyman Hill's office, with whom we are working, to join us, as well as senior staff from Congresswoman Speier and from local mayors, particularly from San Mateo and Santa Clara counties.

We will contact each of the Commissioners to set up ex parte meetings at which we will request that PG&E be present to discuss all of the matters set forth in this letter. But, in particular, we wish to focus on solutions to ensure that "this will never happen again."

Most sincerely,



Faith Bautista
President and CEO
National Asian American Coalition



Len Canty
Chairman
Black Economic Council



Jorge Corralejo
Chairman
Latino Business Chamber of Greater LA

/s/ Patricia Lindo
Patricia Lindo
President
National Hispanic Organization of Real Estate Associates

/s/ Fel Anthony Amistad
Fel Anthony Amistad
President
Filipino American Real Estate Professional Association, Peninsula-SF Chapter

EXHIBIT A

Attendees

1. Fel Anthony Amistad
2. Teresita Solleza
3. Marilyn Becklehimer
4. Robert Chan
5. Maru Francisco-Shubert (San Bruno resident)
6. Cathy Chan
7. Rosemarie Figueroa
8. Simon Dabit
9. Troy Shubert (San Bruno resident)
10. Pablo Tempa
11. Aaron Shubert (San Bruno resident)
12. Michael Sanchez
13. Constantino Perez Jr.
14. Gene Torrea
15. Derrick Perez
16. Ariel MacCarthy
17. Myrna Ahsan
18. Paola Bustos
19. Frances Desamparado
20. Joan Mason
21. Maria Valladares
22. Ted Mason
23. Rafael Vega
24. Rhea Aguinaldo
25. Denise Escobar
26. Mia Martinez
27. Patricia Lindo
28. Dyana Polk
29. Elaine Tannous
30. Mercy Alcantara
31. Jorge Carcamo
32. Frances Boscacci
33. Benjamin Roxas
34. Lila Ledezma
35. Patty Palominos
36. Noni Jaba
37. Tania Cuevas
38. Connie Guevarra
39. Pablo Wong
40. Romy Borja
41. Sophie Borja
42. Mae Perez
43. Yolanda Lewis
44. Jalen Lewis
45. Jamila Stanford

EXHIBIT B

**Individuals Whose Homes Were
Directly Affected By the Explosion**

1. Ricardo Salinda
2. Neria Canonizado
3. Mouna Kayed

EXHIBIT C

Attendees Unable to Find Parking

1. Charito MacDougal
2. Alma Agtane
3. Marilou Sandejas
4. Liz Caguiat
5. Robert Yu
6. Carol Ylagan
7. Maria Brooks
8. Vangie Alegre
9. Lydia Sandejas
10. Leni Encarnacion

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Rulemaking 11-02-019

(February 24, 2010)

CERTIFICATE OF SERVICE

I, Dyana Polk, am 18 years of age or older and a non-party to the within proceeding. I hereby certify that I have this day served a copy of

Opening Comments of Joint Parties, Black Economic Council, Latino Business Chamber of Greater and the National Asian American Coalition

on all known parties to Rulemaking 11-02-019 by transmitting an e-mail message with the document attached to each party named in the official service list and by faxing or mailing a properly addressed copy by first-class mail with postage prepaid to those whose e-mail address is not available.

I certify that the foregoing is true and correct.

Executed in San Bruno, California on April 8, 2011.

/s/ Dyana Polk
Dyana Polk

Service List for R. 11-02-019

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